

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

**AT CHARLESTON**

**UNITED STATES OF AMERICA,**

**v.**

**Case No. 2:20-cr-00054**

**NEDELTCHO VLADIMIROV,**

**Defendant.**

**DEFENDANT’S MOTION FOR ADDITIONAL EXTENSION OF TIME TO FILE  
RULE 33 MOTION FOR NEW TRIAL AND OTHER POST-TRIAL MOTIONS**

Now comes the Defendant, Nedeltcho Vladimirov, by counsel, Timothy J. LaFon, and moves this Honorable Court to Extend the present deadline of August 16, 2021, to file Post-Trial Motions, including Rule 33 Motions to August 30, 2021. In support thereof, the Defendant states as follows:

1. The Defendant’s counsel has been working diligently on Post-Trial Motions.
2. As of August 10, 2021, the Defendant’s counsel received a Notice of Appeal that incorporates various and sundry objections by the Defendant himself that which was filed with the Court.
3. Defense counsel needs time to coordinate with his client applicable to Post-Trial Motions and this filing with the Court.
4. In addition, Defendant’s counsel has been involved in several other Federal criminal defense matters that has occupied his time.
5. Sentencing in this matter is not set until November 18, 2021, therefore an additional extension of two (2) weeks would not prejudice any party in this matter.

THEREFORE, the Defendant moves this Honorable Court to extend by an additional two (2) weeks to August 30, 2021, the deadline to file Post-Trial Motions, including Rule 33 Motion for New Trial and for such other and further relief as this Court deems just.

**NEDELTCCHO VLADIMIROV**

By Counsel.

**CICCARELLO, DEL GIUDICE & LAFON**

By: /s/Timothy J. LaFon  
Timothy J. LaFon (#2123)  
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Attorney for Defendant

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**CERTIFICATE OF SERVICE**

I, Timothy J. LaFon, do hereby certify that the foregoing **“Defendant’s Motion for Additional Extension of Time to File Rule 33 Motion for New Trial and Other Post-Trial Motions”** has been served upon all parties via the Court’s electronic filing system on the 11<sup>th</sup> day of August, 2021:

Andrew Tessman, Esquire  
United States Attorney’s Office  
P.O. Box 1713  
Charleston, West Virginia 25326

**CICCARELLO, DEL GIUDICE & LAFON**

By: /s/Timothy J. LaFon  
Timothy J. LaFon (#2123)  
Attorney for Defendant